

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

<b>UNITED STATES OF AMERICA,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b>Cr. No.: 1:19-cr-10040</b>
	)	
<b>vs.</b>	)	
	)	
<b>JEFFREY YOUNG,</b>	)	
	)	
<b>Defendant.</b>	)	

**GOVERNMENT’S JOINDER OF DEFENDANT’S MOTION TO CONTINUE  
SENTENCING**

Comes now the United States of America through undersigned counsel, and shows as follows:

1. On January 9, 2024, the Defendant moved to continue the sentencing in the captioned matter in order to ensure an opportunity to thoroughly review and respond to the government’s sentencing brief.
2. In advance of filing his motion to continue the sentencing, counsel for the defendant conferred with the government, representing that he required more time to adequately answer the government’s patient-by-patient analysis. The government expressed a preference to proceed with the sentencing as planned as planned, and noted that there the government’s sentencing brief was based on trial evidence, which has been available to the defendant since the trial in March 2023. However, knowing defense counsel to be a competent and diligent attorney, and taking the intervening holidays into account, the government agreed that it would take no position on the continuance motion.

3. On January 9, 2024, the undersigned attorney for the government was ordered to report for jury service in the District of the District of Columbia (Superior Court), and on January 10, was selected as a juror for a three-week criminal trial in that district.
4. In order to permit the undersigned to complete her jury service, and in light of defense counsel's representation that he needs more time to undertake a more thorough analysis in light of the government's filing, the government now joins the defendant's motion to continue.

Respectfully submitted,

/s/ Katherine Payerle

Katherine Payerle  
Assistant Chief  
Andrew Pennebaker  
Trial Attorney  
U.S. Department of Justice

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was electronically filed through ECF on January 10, 2024.

/s/ Andrew Pennebaker

Andrew Pennebaker  
Trial Attorney